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*[Proposed] Counsel for Official Committee  
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re  
CASH CLOUD, INC. dba COIN CLOUD,  
  
Debtor.

Case No.: 23-10423-mkn  
Chapter 11

**SECOND STIPULATION EXTENDING THE  
CHALLENGE PERIOD SET FORTH  
IN THE FINAL DIP ORDER**

This stipulation (this “Stipulation”) is entered into as of May 17, 2023, by and among  
(i) Cash Cloud, Inc. dba Coin Cloud, the debtor and debtor in possession (the “Debtor”) in the above-  
captioned chapter 11 case (the “Chapter 11 Case”), (ii) the Official Committee of Unsecured

Creditors (the “Committee”), and (iii) Enigma Securities Limited (the “Enigma,” and, together with the Debtor and the Committee, collectively, the “Parties”), to extend the Committee’s “Challenge Period” (as such term is defined in the *Final Order Under Bankruptcy Code Sections 105, 361, 362, 363, 364(c)(1), 364(c)(3), 364(d)(1) and 364(e) and Bankruptcy Rules 2002, 4001, 6004 and 9014 Authorizing Debtor to (A) Obtain Postpetition Financing and (B) Grant Adequate Protection* [ECF No. 318] (the “Final DIP Order”),<sup>1</sup> and the Parties stipulate and agree as follows:

### **RECITALS**

This Stipulation is entered into with reference to the following recitals:

**WHEREAS**, on February 7, 2023, the Debtor commenced a voluntary case under chapter 11 of the Bankruptcy Code in this Court;

**WHEREAS**, on February 17, 2023, the Office of the United States Trustee filed a notice of appointment of the Committee [ECF No. 131], as amended on February 28, 2023 [ECF No. 177];

**WHEREAS**, on March 20, 2023, the Court entered the Final DIP Order, which provided for a Challenge Period for the Committee of sixty (60) calendar days from appointment of the Committee, resulting in a Challenge Period Termination Date of April 18, 2023;

**WHEREAS**, the Parties desire to enter into this Stipulation on the terms and conditions set forth herein; and

**WHEREAS**, the undersigned hereby represent and warrant that they have full authority to execute this Stipulation on behalf of the respective Parties and that the respective Parties have full knowledge of, and have consented to, this Stipulation.

### **STIPULATION**

1. The Challenge Period set forth in Paragraph 17(b) of the Final DIP Order applicable to the Committee shall be extended through and including June 23, 2023 (the “Committee Challenge Period Extension Date”) solely with respect to those challenges to the validity, perfection and priority of the Enigma Liens that were specifically identified by counsel to the Committee in writing

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Final DIP Order.

1 to counsel to Enigma on April 14, 2023 (the “Disclosed Challenges”), for which challenges the term  
2 Committee Challenge Period Extension Date shall replace the term Challenge Period under the Final  
3 DIP Order for all purposes. For the avoidance of doubt, this Stipulation does not extend the  
4 Committee’s Challenge Period for potential challenges, claims and allegations that are not Disclosed  
5 Challenges. Potential claims or allegations subject to the Challenge Period that are not Disclosed  
6 Challenges shall be treated in accordance with and pursuant to Paragraph 17 of the Final DIP Order.

7 2. Nothing herein shall limit the Committee’s right to seek to extend further the  
8 Committee Challenge Period Extension Date with respect to the Disclosed Challenges for cause in  
9 accordance with the Bankruptcy Code.

10 3. For the avoidance of doubt, this Stipulation shall not impact in any way the expiration  
11 of the Challenge Period with respect to any parties, matters, issues, or items other than with respect  
12 to those specifically addressed herein.

13 4. Except as expressly set forth in this Stipulation, all provisions of the Final DIP Order  
14 (as amended by subsequent orders of the Court from time to time) remain in full force and effect  
15 and are not modified by this Stipulation in any way. For the avoidance of doubt, nothing herein  
16 shall be deemed to extend or change the Challenge Period set forth in the Final DIP Order with  
17 respect to any party in interest other than the Committee.

18 5. This Court shall retain jurisdiction with respect to all matters arising from or related  
19 to this Stipulation.

20 6. This Stipulation may be executed in counterparts, each of which constitutes an  
21 original, and all of which, collectively, constitute only one agreement.

**IT IS SO STIPULATED BY:**

Dated May 17, 2023.

FOX ROTHSCHILD LLP

/s/ Brett A. Axelrod

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Dated May 17, 2023.

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*Counsel for Official Committee  
of Unsecured Creditors*

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1 Dated May 17, 2023.

2 MORRISON & FOERSTER LLP

3 /s/ Andrew Kissner

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5 Andrew Kissner, Esq.

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